

EXHIBIT A

**Page 2 From Redline of Sixth Stipulated Motion
To Extend Deadlines Following Frontier's
Deletion of Plaintiffs' Changes**

Specifically, the Parties seek to extend these deadlines as follows:

1. Extend the deadline to disclose initial experts from September 24, 2021 to *March 23, 2022*;
2. Extend the deadline to disclose rebuttal experts from October 29, 2021 to *April 27, 2022*;
3. Extend the discovery cutoff date from November 26, 2021 to *May 25, 2022*;
4. Extend the deadline to file dispositive motions from December 31, 2021 to *June 29, 2022*;
- ~~and and~~
5. Extend the deadline to file the joint proposed pretrial order from *January 28, 2022 to July 27, 2022*; ~~and~~
- ~~5.6. Extend the deadline to move to amend the pleadings to *October 29, 2021*.~~

The Parties have been working diligently to complete fact discovery. Written discovery is ongoing, subpoenas for records have been, and continue to be, issued, and fifteen (15) party and fact witness depositions have been completed. The Parties continue to work to obtain outstanding records from medical providers and other institutions with damages-related information, and to schedule the remaining fact witness and treating physician depositions. Following applicable Orders from this Court and several meet-and-confer conferences with Plaintiffs, Frontier has steadily-recently been supplementing its written discovery responses and document production (although Plaintiffs have issues with the time it has taken to produce responsive documents and the redaction of certain information from the documents produced). However, given the breadth and scope of inquiry, Frontier will require additional time to complete its search for responsive information and documents. The Parties agree that production of these documents is a prerequisite to conducting the Fed. R. Civ. P. 30(b)(6) depositions noticed by Plaintiffs, which in turn must be completed before expert disclosures. Additionally, Plaintiffs have indicated they intend seek leave to amend their Complaint to include, among other things, new information received in Frontier's recent document productions, which will involve motion practice. Thus, an extension of deadlines is necessary.